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11 FlatWorld Interactives LLC

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

15 FLATWORLD INTERACTIVES LLC, a )  
16 Pennsylvania limited liability company, )  
17 Plaintiff, )  
18 v. )  
19 APPLE INC, a California corporation, )  
20 Defendant. )

No. C 12-01956 JSW

**DECLARATION OF RYAN MEYER  
IN SUPPORT FLATWORLD'S  
ADMINISTRATIVE MOTION FOR  
IN CAMERA REVIEW OF CERTAIN  
PRIVILEGED DOCUMENTS**

**JURY TRIAL REQUESTED**

**DATE ACTION FILED:**  
April 19, 2012

1 I, Ryan Meyer, declare:

2 1. I am an attorney at Hagens Berman Sobol Shapiro LLP ("Hagens Berman"),  
3 attorneys of record for FlatWorld Interactives LLC ("FlatWorld") in this matter. I make this  
4 declaration based upon my personal knowledge and am competent to testify as to the matters stated  
5 herein.

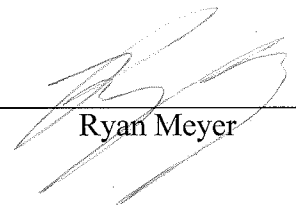
6 2. FlatWorld engaged Hagens Berman as counsel for enforcing US Patent No.  
7 RE43318 in early March 2012.

8 3. On May 29, 2013, I asked Apple's counsel, Michael Pieja, if Apple would stipulate  
9 to *in camera* review of documents identified in the concurrently filed administrative motion. Mr.  
10 Pieja replied that Apple declined to take a position as to the motion at the time of filing, but  
11 reserved its right to oppose FlatWorld's administrative motion.

12 4. Attached as Exhibit A are true and correct excerpts of the amended privilege log for  
13 John McAleese and the amended privilege log for FlatWorld. These excerpts include only the  
14 documents that are dated between January 2012 and the present, and that are relied upon by Apple  
15 in its motion to disqualify Hagens Berman. They have been de-duplicated, so if the same  
16 document was logged by another party, the duplicative log entries are not included.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Signed in Seattle, Washington, this 11th day of June, 2013.

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21   
22 Ryan Meyer  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2013, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the email addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List. Any non-CM/ECF participants will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Steve W. Berman  
STEVE W. BERMAN

# ***Exhibit A***

**EXHIBIT A to the Declaration of Ryan Meyer****EXCERPTS FROM THE AMENDED JOHN J. MCALEESE, III PRIVILEGED AND REDACTION DOCUMENT LOG FOR IN CAMERA REVIEW**

Document Number	Author	Recipient	Date	Subject Matter Addressed in Document	Purpose	Specific Basis for Claim	Title and/or Description of Document
JMPriv004A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	12/06/12	Email containing Gene Nelson legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv005A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	12/03/12	Email containing legal advice pertaining to FlatWorld litigation. A redacted version was produced at JM-00000001.	Drafted for purpose of litigation.	Spousal	Email
JMPriv007A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	11/09/12	Email containing Mark Carlson legal advice pertaining to FlatWorld litigation. A redacted version was produced at JM-00000003.	Drafted for purpose of litigation.	Spousal	Email
JMPriv009	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	07/07/12	Email regarding potential FlatWorld patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv010	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	07/07/12	Email discussing legal advice from Hagens Berman pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv011A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	07/07/12	Email containing Mark Carlson and Steve Berman legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv013A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	07/07/12	Email containing Mark Carlson legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv014A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	07/07/12	Email containing Mark Carlson legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv017A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	06/11/12	Email containing Mark Carlson legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv018A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	04/26/12	Email containing Steve Berman and Mark Carlson legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv020	Jennifer McAleese (jenmcaleese@gmail.com)	Slavko Milekic (kiddyface@gmail.com), Gene Nelson (genelson@comcast.net), John J. McAleese, III (j.mcaleese@att.net)	04/25/12	Email to Gene Nelson (genelson@comcast.net) discussing litigation concerning FlatWorld.	Drafted for purpose of litigation.	Spousal; Attorney-Client	Email
JMPriv023A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/24/12	Email containing legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv026A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/23/12	Email containing Mark Carlson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email

Case3:12-cv-01956-WHO Document145-1 Filed06/11/13 Page6 of 7  
**EXHIBIT A to the Declaration of Ryan Meyer**

Document Number	Author	Recipient	Date	Subject Matter Addressed in Document	Purpose	Specific Basis for Claim	Title and/or Description of Document
JMPriv027A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/23/12	Email containing Mark Carlson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv028A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/22/12	Email containing Mark Carlson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv030	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/21/12	Email containing Gene Nelson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv032A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/15/12	Email containing Gene Nelson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv035	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/15/12	Email containing Gene Nelson legal advice regarding FlatWorld representation for patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv036	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/03/12	Email with discussion regarding potential representation for FlatWorld patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv037	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net); Jennifer McAleese (jenmcaleese@gmail.com)	02/03/12	Email with discussion regarding potential representation for FlatWorld patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv038	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/03/12	Email with discussion regarding potential representation for FlatWorld patent litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv225A	John J. McAleese, III (jmcaleese@morganlewis.com)	Jennifer McAleese (jenmcaleese@gmail.com)	02/25/13	Email with discussion regarding FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv225B	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (jmcaleese@morganlewis.com)	02/25/13	Email with discussion regarding FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv226	John J. McAleese, III (jmcaleese@morganlewis.com)	Jennifer McAleese (Email Address Unknown)	05/21/12	Email with discussion regarding material related to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv021A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	02/24/12	Email containing Michael Bonella (mbonella@ktmc.com) legal advice pertaining to FlatWorld litigation.	Drafted for purpose of litigation.	Spousal	Email
JMPriv039A	Jennifer McAleese (jenmcaleese@gmail.com)	John J. McAleese, III (j.mcaleese@att.net)	01/09/12	Email containing Michael Bonella (mbonella@ktmc.com) legal advice regarding potential FlatWorld patent litigation.	Drafted for purpose of litigation.	Spousal	Email

**EXHIBIT A to the Declaration of Ryan Meyer****EXCERPT FROM THE THIRD AMENDED FLATWORLD PRIVILEGED AND REDACTION DOCUMENT LOG FOR IN CAMERA REVIEW**

Document Number	Author	Recipient	Date	Subject Matter Addressed in Document	Purpose	Specific Basis for Claim	Title and/or Description of Document
PRIV0407	Jennifer McAleese (jenmcaleese@gmail.com)	John McAleese (j.mcaleese@att.net)	02/24/12	Email containing legal advice regarding FlatWorld patent reissue.	Drafted for purpose of prosecution and business planning.	Spousal; Attorney-Client	Email